

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED
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MAY 08 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Plaintiff(s) Charles R. Heath

V.

08cv2656
JUDGE KOCORAS
MAG. JUDGE SCHENKIER

Defendant(s) Citibank N.A.

COMPLAINT

Jury Trial Demanded

Plaintiff alleges and pleads the following:

- 1.) That the Plaintiff is a citizen and resides at 8918 S. Normal , City of Chicago , County of Cook , State of Illinois.
- 2.) That the Defendant is a bank , doing business at 8650 S. Stoney Island Ave., City of Chicago. County of Cook, State of Illinois
- 3.) That the Defendant, without regard for the Plaintiff's privacy or property, negligently failed to provide a safe storage for the Plaintiff's property.
- 4.) That the Defendant did not have secure operating procedures for the safe desposit boxes,
- 5.) That the Defendant failed to properly investigate theft charges.
- 6.) That the Defendant mishandled and misplaced documents.
- 7.) That thru the above acts the plaintiff suffered lost of income, loss chance and mental anguish and unnecessary delay.

Jurisdiction and Venue

- 1.) Section 1882 a of the U.S. Code, Title 12, Chapter 19, is the statute that this court jurisdiction over this action.
- 2.) The practices alleged to be unlawful were and are now being committed within the jurisdiction of the United States District Court for the Northern District of Illinois Eastern Division.

Relief

- 1.) \$100 a day. starting October 24, 2007
- 2.) Punitive damages of ten times the above amount.
- 3.) Court costs and any other relief that the court awards.



5-08-08

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